

REMARKS

This application has been carefully reviewed in light of the Office Action dated November 24, 2006. Claims 34 to 41 are in the application, of which Claim 34 is the sole independent claim. Reconsideration and further examination are respectfully requested.

In the Office Action, all of the then-pending claims were rejected under 35 U.S.C. § 103(a), primarily over U.S. Patent Application Publication 2001/0052927 (Takase) in view of Japan 2003-195207 (Kobayashi), or over Takase in view of U.S. Patent 6,928,100 (Sato)^{1/}. In response, all claims have been cancelled, and new Claims 34 to 41 substituted therefor. These actions have been taken without prejudice or disclaimer of subject matter, and without conceding the correctness of the rejections. This therefore should be viewed as a traversal of the rejections, for the reasons detailed below.

The invention defined by independent Claim 34 concerns an image forming apparatus having first and second image bearing members which are respectively irradiated by laser beams emitted from respective first and second laser elements, via a rotary polygonal mirror that commonly scans the laser beams. Electrostatic latent images formed thereby are toner-developed onto a recording material.

The invention thus contemplates within its scope an optical system which uses a common rotary polygonal mirror, which is advantageous in reducing size and

^{1/}Applicant continues to traverse the use of the U.S. patent to Sato, pursuant to the provisions of 35 U.S.C. § 103(c), for the reasons of record.

complexity as compared with optical systems that utilize a rotary polygonal mirror for each laser beam.

Such optical systems, however, have higher requirements for positional accuracy of one laser element relative to another. According to the invention, therefore, an integral laser unit is provided, which comprises first and second laser elements arranged to irradiate the first and second image bearing members, respectively. First and second lens barrel portions hold the first and second laser elements, respectively.

Moreover, to provide additional positional accuracy, a part of a side wall of the first lens barrel portion is shared with a part of a side wall of the second lens barrel portion. By virtue of this feature, since there is a common member that serves as part of the side wall of the first and second lens barrel portions, positional accuracy of the claimed laser unit is increased.

With respect to the applied references, all of Takase, Kobayashi and Sato are apparently concerned with irradiation of a single image bearing member, and not of first and second image bearing members. These references might disclose multiple laser beams, but all of the multiple laser beams are apparently irradiated onto a single image bearing member. These references are therefore not pertinent to the claimed invention.

In the rejection of now-cancelled dependent claims, the Office Action additionally relied on one or more of the following: U.S. Patent 6,621,512 (Nakajima), U.S. Patent 6,867,794 (Cervantes), and U.S. Patent Application Publication 2002/0036683 (Yokoyama). Neither Nakajima nor Cervantes are seen to disclose or to suggest anything relevant to the above discussion. As for Yokoyama, page 10 of the Office Action stated

that it disclosed “a tandem color image forming apparatus [] provided with a separate photosensitive drum to be exposed by a respective laser light source to form a full color image, the laser element and the corresponding collimator lens being integrally fixed into a respective holder”. Even as so characterized, however, it is Applicant’s position that the laser units of Yokoyama are provided with separate sides of lens barrel portions of the laser units corresponding to respective photosensitive members. Accordingly, in the laser units of Yokoyama, a side wall of one lens barrel portion is not shared with a side wall of another lens barrel portion. In view of this deficiency, Yokoyama also does not obtain the advantageous effect of the present invention, wherein positional accuracy between respective laser elements is improved.

It is therefore respectfully submitted that the claims herein define subject matter that would not have been obvious, and allowance of the claims is respectfully requested.

Applicant's undersigned attorney may be reached in our Costa Mesa,
California office by telephone at (714) 540-8700. All correspondence should be directed to
our address given below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael K. O'Neill", written over a horizontal line.

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